
From: Stuber, Robyn
Sent: Tuesday, January 21, 2014 10:49 AM
To: Sablad, Elizabeth
Cc: Marincola, JamesPaul
Subject: RE: Agreements/follow-up actions and Intake Credits

Hi Elizabeth.

The RB2 C&H permit is not a power plant, but uses cooling water and intake credits in the industrial process of the sugar cane refinery. The final permit and subsequent permit modification are a good example of how to implement intake credits in cooling water.

Robyn

From: Sablad, Elizabeth
Sent: Friday, January 17, 2014 8:29 AM
To: Stuber, Robyn; Marincola, JamesPaul
Subject: FW: Agreements/follow-up actions and Intake Credits

Hi Robyn and Jamie,
Do you know of any permits, maybe southern California powerplants, with particularly good incorporation of intake credits? Hawaii has requested examples.

-Elizabeth

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From: Sablad, Elizabeth
Sent: Friday, January 17, 2014 8:28 AM
To: 'Lum, Darryl C'
Cc: Smith, DavidW
Subject: Agreements/follow-up actions and Intake Credits

Hi Darryl,
At first glance, these timeframes look doable. I did receive the consistency documents from Marianne. Thanks!

For intake credits, the CFR cite is 40 CFR 122.45(g), which applies to TBELs, although California adopted similar requirements in section 1.4.4 of their **Policy for Implementation of Toxics Standards for Inland Surface Waters** for WQBELs:

http://www.swrcb.ca.gov/water_issues/programs/state_implementation_policy/docs/final.pdf

As far as example permits with intake credits, I'll need some time to look into that.

-Elizabeth

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From: Lum, Darryl C [<mailto:darryl.lum@doh.hawaii.gov>]
Sent: Thursday, January 16, 2014 2:07 PM
To: Sablad, Elizabeth
Subject: RE: Agreements/follow-up actions for your review

Hi Elizabeth,

Everything looks good. I asked Marianne to email you our consistency document.

We did forget to bring up the limit set issue. Due to restrictions in our database, the CWB Engineers will be inputting the limit sets into our database, which will flow to ICIS. Due to this additional work and the learning curve, ICIS may not be updated as quickly as before.

Please see below in **green** for draft timeframes. I made this up. Glenn and I are meeting with Myron next week Tuesday to go over the draft revisions to our WQS. After that we'll need to run the draft by Alec, Watson, and Ted. I think if we could get the intake credit examples soon that would be helpful. Also, our priority is the standard water quality assessment methodology.

Thanks,
Darryl

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From: Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]
Sent: Wednesday, January 15, 2014 8:44 AM
To: Lum, Darryl C
Subject: Agreements/follow-up actions for your review

Hi Darryl,
Can you review these and let me know if I mischaracterized anything? We should also think about timeframes for holding these sessions. Any thoughts would be appreciated! Thanks!!

-Elizabeth

Key agreements:

- a. DOH will reissue FY13 and earlier carryover major permits (Honouliuli, Sand Island, Kailua, Chevron, MCB Kaneohe Bay, and Hilo) no later than September 30, 2014.
- b. DOH will review contract schedule and adhere more closely to agreed-upon turn-around times for permit deliverables.
- c. DOH will issue permits included in the FY14 Permit Issuance Schedule.

Follow-up meetings/actions:

- a. Potential Maui MS4 designation scope and process: DOH/EPA will hold follow-up discussion. **April 2014**
- b. Navy petition on WQS: DOH/EPA will hold follow-up discussion, including WQS staff. **April 2014**
- c. Permit Writer's Training: EPA will determine process/logistics of hosting a training and provide to DOH. **February 2014**
- d. Fact Sheet Development Review and Q &A: **March 2014**
 - 1. DOH will provide draft consistency document to EPA for review.
 - 2. DOH/EPA will hold follow-up discussion.
- e. Guidance on reviewing ZOM/dilution studies **April 2014**
 - 1. EPA will send DOH guidance document.
 - 2. DOH/EPA will hold follow-up discussion.
- f. Intake credit policy and implementation examples **January or early February 2014**
 - 1. EPA will provide DOH examples.
 - 2. DOH/EPA will hold follow-up discussion, including WQS staff.
- g. Permit as a shield: DOH/EPA will hold follow-up discussion, including enforcement staff. **March 2014**

Spring Working Meetings/Workshops: **Begin discussion ending of January or early February 2014**

- a. Standard water quality assessment methodology and how consistent sampling/monitoring frequencies should be set to demonstrate compliance with all components of WQS.
- b. System to enforce HAR 11-54 and 11-55 requirements, including "unpermitted discharges": including WQS, Enforcement, and ORC staff.

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